

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

| | | |
|--|---|--------------------------------|
| |) | |
| Seoul Semiconductor Co., Ltd., |) | |
| <i>a Korean Corporation</i> , and Seoul Viosys |) | |
| Co., Ltd., <i>a Korean Corporation</i> , |) | Civil Action No. 1:23-cv-02690 |
| |) | |
| Plaintiffs, |) | |
| |) | |
| Ace Hardware Corporation, |) | |
| |) | |
| Defendant, |) | |
| |) | |

JOINT MOTION FOR A TEMPORARY STAY OF LITIGATION PROCEEDINGS

Plaintiffs Seoul Semiconductor Co., Ltd. and Seoul Viosys Co., Ltd. (collectively, “Seoul”) and Defendant Ace Hardware Corporation (“Ace”) respectfully and jointly request a thirty (30) day stay of this litigation. Seoul and Feit Electric Co., Inc. (“Feit”), one of the suppliers of the accused products, have executed a non-binding term sheet and expression of intent to resolve the various litigations pending between them, including this litigation. While the terms of the Term Sheet are confidential, they require SSC and Feit, where applicable, to jointly seek a 30-day stay in this litigation to finalize a settlement agreement incorporating the terms of the Term Sheet. SSC and Feit are optimistic that they will be able to work together in good faith to reach a final agreement. Accordingly, SSC and Ace hereby jointly request a stay of the present litigation for thirty (30) days in the interest of the parties and judicial efficiency while discussions continue toward reaching a final settlement agreement.

Dated: March 27, 2025

Respectfully Submitted,

/s/ Etai Lahav
 David C. Radulescu, Ph.D. (*pro hac vice*)
 Etai Lahav (*pro hac vice*)
 Jonathan Auerbach (*pro hac vice*)
 Bryon T. Wasserman (*pro hac vice*)
RADULESCU LLP
 5 Penn Plaza, 19th Floor

/s/ Kalpesh K. Shah
 Eric J. Maiers
 Matthew J. Levinstein
 James J. Lukas, Jr
 Olivia Catherine Mathews
Greenberg Traurig, LLP
 77 W Wacker Dr Ste 3100,

New York, NY 10001
646-502-5950
david@radip.com
etai@radip.com
jonathan@radip.com
bryon@radip.com

Kevin S. Kudlac (*pro hac vice*)
RADULESCU LLP
111 Congress Avenue, Ste. 500
Austin, TX 78701
512-656-5743
kevin@radip.com

David Randolph Bennett
Steven G Kalberg
Direction IP Law
P.O. Box 14184
2620 N. Burling St.,
Chicago, IL 60614
(312) 291-1667
dbennett@directionip.com
skalberg@directionip.com

Attorneys for Plaintiffs
Seoul Semiconductor Co., Ltd., and
Seoul Viosys Co., Ltd.

Chicago, IL 60601
(312) 456-8400
levinsteinm@gtlaw.com
Eric.Maiers@gtlaw.com
lukasj@gtlaw.com
Olivia.mathews@gtlaw.com

Mary F. Fetsco
Fitch, Even, Tabin & Flannery LLP
Illinois
120 S. LaSalle Street, Suite 2100
Chicago, IL 60603
312-577-7000
mfetsco@fitcheven.com

Simeon G. Papacostas
Kalpesh K. Shah
Cristina A. Almendarez
Theresa Starck
Eric J. Maiers
Matthew Joshua Levinstein
**Benesch, Friedlander, Coplan & Aronoff
LLP**
71 S. Wacker Drive, Suite 1600
Chicago, IL 60606
(312) 212-4949
SPapacostas@beneschlaw.com
kshah@beneschlaw.com
calmendarez@beneschlaw.com
tstarck@beneschlaw.com
maierse@gtlaw.com
rwhitman@fitcheven.com
levinsteinm@gtlaw.com

Attorneys for Defendant
Ace Hardware Corporation

DATED: March 31, 2025

BENESCH FRIEDLANDER
COPLAN & ARONOFF LLP

By: /s/Kalpesh K. Shah
Simeon G. Papacostas
Kalpesh K. Shah
Cristina A. Almendarez
Theresa Starck
Eric J. Maiers
Matthew Joshua Levinstein

*Attorneys for Defendant
Ace Hardware Corporation*

DATED: March 31, 2025

RADULESCU LLP

By: /s/ Kevin S. Kudlac
Kevin S Kudlac

*Attorneys for Plaintiff
Seoul Semiconductor Co., Ltd. and
Seoul Viosys Co., Ltd.*

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via electronic filing and/or electronic mail on March 27, 2025.

/s/ Etai Lahav

Etai Lahav